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BY ELECTRONIC COMMENT FILING SYSTEM

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Developing an Unified Inter-carrier Compensation Regime – WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135; WC Docket No. 05-337; CC Docket No. 01-92; CC Docket No. 96-45; WC Docket No. 03-109 — Ex Parte Communication

Dear Ms. Dortch:

On October 19, 2011, Carl W. Northrop and Michael Lazarus of Telecommunications Law Professionals PLLC ("TLP"), on behalf of MetroPCS Communications, Inc. ("MetroPCS"), spoke via conference call with Michael Steffen of the Office of General Counsel to discuss the above-referenced proceedings.

During the call, MetroPCS noted its strong support of the Commission's efforts to reform the inter-carrier compensation system by adopting a unified regime. MetroPCS expressed its hope that the stars are finally in alignment for the Commission to reform an outdated system that has fostered diseconomic arbitrage and inefficiencies for way too long. MetroPCS urged the Commission to adopt a course that will allow the necessary comprehensive reforms to be put in place as soon as practicable.

MetroPCS discussed its support for a regime in which the ultimate outcome leads to all traffic being exchanged under a bill-and-keep arrangement, and its hope that the transition period for such an arrangement occur as soon as possible (e.g., no longer than four years). MetroPCS also noted its support for immediate Commission action that would curb traffic pumping in both the local reciprocal compensation and interstate access markets. Such action is critical, as traffic pumping has escalated to include wide-scale fraudulent schemes. What started as a cottage industry of encouraging customers of carriers to call for access-supported services has become something much more sinister, with carriers going to surprising lengths to generate traffic.

MetroPCS further noted that, ultimately, all communications traffic should be subject to a common framework. Until that eventuality, however, MetroPCS believes that it would be a mistake to

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apply the current, broken interconnection framework immediately to Voice over Internet Protocol ("VoIP") traffic. Instead, MetroPCS recommends that the Commission bring VoIP into the fold only once any transition periods end and all traffic is settled where intercarrier compensation rates eventually will end up. Any other outcome may result in inefficiencies with respect to VoIP traffic, as well as additional costs to consumers in the near-term.

Any questions regarding this notice should be directed to the undersigned.

Sincerely,

/s/ Michael Lazarus

Michael Lazarus
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc (via email): Michael Steffen